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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 TRAVIS CHRISTIAN GOBER,
15 Defendant.

CASE NO. 1:21-CR-00263-JLT-SKO

STIPULATION AND ORDER TO CONTINUE
JANUARY 19, 2022, STATUS CONFERENCE

17 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
18 through defendant's counsel of record, hereby stipulate as follows:

19 1. This matter was set for status on January 19, 2022, at 1:00 p.m. By this stipulation,
20 defendant now moves to continue the status conference until March 16, 2022, and to exclude time
21 between January 19, 2022, and March 16, 2022, under Local Code T4.

22 2. The parties apologize for this untimely request to continue the status conference. The
23 parties intended to submit a stipulation earlier and did not realize that the Court's deadline had passed.

24 3. The parties agree and stipulate, and request that the Court find the following:

25 a) The government has produced initial discovery in this matter. That discovery
26 consists of approximately 57,000 pages of documents and includes Medicare data, witness
27 interviews, and audit documents from a Medicare contractor.

28 b) Counsel for defendant desires additional time to review discovery, discuss this

1 case with her client, and explore possible resolutions of this matter with her client and the
2 government.

3 c) Counsel for defendant believes that failure to grant the above-requested
4 continuance would deny him/her the reasonable time necessary for effective preparation, taking
5 into account the exercise of due diligence.

6 d) The government does not object to the continuance.

7 e) Based on the above-stated findings, the ends of justice served by continuing the
8 case as requested outweigh the interest of the public and the defendant in a trial within the
9 original date prescribed by the Speedy Trial Act.

10 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
11 et seq., within which trial must commence, the time period of January 19, 2022, to March 16,
12 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
13 T4] because it results from a continuance granted by the Court at defendant's request on the basis
14 of the Court's finding that the ends of justice served by taking such action outweigh the best
15 interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

Dated: January 13, 2022

PHILLIP A. TALBERT
United States Attorney

Dated: January 13, 2022

/s/ VINCENTE A. TENNERELLI
VINCENTE A. TENNERELLI
Assistant United States Attorney

FINDINGS AND ORDER

The parties' Stipulation to continue the status conference to March 16, 2022, is GRANTED. The parties are *cautioned* that any future stipulations to continue not supported by good cause will be denied.

IT IS SO ORDERED.

Dated: **January 14, 2022**

/s/ Sheila K. Oberto

UNITED STATES MAGISTRATE JUDGE